

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>RICARDO MCKENDRICK, SR.</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>RICARDO MCKENDRICK, JR.</b>	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	<b>:</b>	<b>and to possess with intent to distribute 5</b>
	<b>:</b>	<b>kilograms or more of cocaine - 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession with</b>
	<b>:</b>	<b>intent to distribute 5 kilograms or more</b>
	<b>:</b>	<b>of cocaine - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c) (possession of a firearm</b>
	<b>:</b>	<b>in furtherance of a drug trafficking</b>
	<b>:</b>	<b>crime - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about April 1, 2008, to on or about April 2, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**RICARDO MCKENDRICK, SR. and**  
**RICARDO MCKENDRICK, JR.**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with intent to distribute 5 kilograms or more, that is, approximately 274 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR. shared the use of a house located at 2606 Federal Street in Philadelphia, Pennsylvania, which they used to facilitate the storage, packaging, and distribution of cocaine.

4. Defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR. stored their supply of cocaine primarily in the basement of the house, along with United States currency, packaging materials, a hydraulic press for making kilogram “bricks” of cocaine, and scales.

5. Defendant RICARDO MCKENDRICK, SR. kept a firearm at the house to protect the cocaine supply and money.

6. Defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR. possessed more than \$1,050,000 in their Philadelphia and New Jersey residences and their motor vehicles.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR., and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about April 2, 2008, inside their residence located at 2606 Federal Street in Philadelphia, Pennsylvania:

1. Defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR. stored approximately 274 kilograms of cocaine.
2. Defendants RICARDO MCKENDRICK, SR. and RICARDO MCKENDRICK, JR. also possessed packaging materials used to package cocaine for further distribution, drug paraphernalia including a scale, a hydraulic press for making kilogram “bricks” of cocaine, and \$6,028 in United States currency.
3. RICARDO MCKENDRICK, SR. possessed a firearm for the purpose of protecting the drug supply and money.
4. Defendant RICARDO MCKENDRICK, JR. stored approximately \$982,144 in United States currency in the trunk of his Mercedes at his primary residence in Woodstown, New Jersey.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**RICARDO MCKENDRICK, SR. and  
RICARDO MCKENDRICK, JR.**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the  
possession with the intent to distribute of, 5 kilograms or more, that is, approximately 274  
kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**RICARDO MCKENDRICK, SR.**

knowingly possessed a firearm, that is, a Smith & Wesson .38 caliber, serial number C224154,  
loaded with 6 rounds of ammunition, in furtherance of a drug trafficking crime for which he may  
be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine,  
in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendant

**RICARDO MCKENDRICK, SR.**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to a Smith & Wesson .38 caliber,, serial number C224154, loaded with 6 rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**PATRICK L. MEEHAN**  
**United States Attorney**